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Attorneys for Plaintiff CHARLES RESTIVO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION

CHARLES RESTIVO,

Plaintiff,

v.

COGSWELL COLLEGE, LLC, doing
business as the University of Silicon
Valley, BRAD PALMER, PALM
VENTURES, LLC, and DOES 1 to 5,
Defendants.

Case No. 5:23-cv-01548-BLF

Honorable Beth Labson Freeman

**JOINT STIPULATION TO SET AND
ATTEND SETTLEMENT
CONFERENCE**

Removed from the Superior Court of the
State of California, Case No. 23CV411826

State Court Action Filed: February 14, 2023
Removal Filed: March 31, 2023

1 **IT IS HEREBY STIPULATED** by and between Plaintiff Charles Restivo
2 (“Plaintiff”), Defendants Cogswell College, LLC, Brad Palmer, and Palm Ventures, LLC
3 (“Defendants”, and together with Plaintiff, the “Parties”), by and through their counsel of
4 record as follows:

5 **WHEREAS**, on February 14, 2023, Plaintiff filed his individual claims for unpaid
6 wages, breach of contract, and fraud in the Superior Court of California, County of Santa
7 Clara;

8 **WHEREAS**, on March 31, 2023, Defendants removed this case to the United States
9 District Court for the Northern District of California;

10 **WHEREAS**, on April 21, 2023, Defendants filed their Motion to Dismiss this case,
11 which was fully briefed on May 12, 2023, but is not set for hearing until September 14,
12 2023;

13 **WHEREAS**, the Parties wish to engage in early mediation in hope of resolving their
14 dispute;

15 **IT IS HEREBY STIPULATED** that the Parties, by and through their counsel of
16 record, move this Court for an order compelling them to attend a settlement conference with
17 Magistrate Judge Joseph Spero, or such other mediator as this Court may appoint, prior to
18 September 14, 2023, the hearing date for Defendants’ Motion to Dismiss.

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20 Dated: May 25, 2023

GREENBERG TRAURIG, LLP

21
22 By /s/ Charles O. Thompson
23 Charles O. Thompson
24 Erik J. Christensen
25 Attorneys for Defendants COGSWELL
26 COLLEGE, LLC, BRAD PALMER, AND PALM
27 VENTURES, LLC
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1 Dated: May 25, 2023

EDLESON, REZZO & HINDMAN

2
3 By/s/ Louis Edleson
4 Louis "Chip" Edleson
5 Joann F. Rezzo
Jesse Hindman
Attorneys for Plaintiff CHARLES RESTIVO

6 Pursuant to Local Rule 5-1(h)(3), the filer attests that all other signatories listed, and on
7 whose behalf the filing is submitted, concur in the filing's content and have authorized the
8 filing.
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